

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

VINCENT SORACE, JOSEPH YERTY,	)	
TAMMY YERTY, JAMES ZARONSKY,	)	
LINDA ZARONSKY, VIKTOR	)	CIVIL ACTION
STEVENSON, ASHLEY YATES,	)	
and KIMBERLY SOLOMON-ROBINSON,	)	No. 2:20-CV-4318
individually and on behalf of a class	)	
of similarly situated persons,	)	Hon. Gerald J. Pappert
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
WELLS FARGO BANK, N.A.,	)	
	)	
Defendant.	)	
	)	

**PLAINTIFFS' MOTION FOR PRELIMINARY SETTLEMENT  
APPROVAL, CERTIFICATION OF THE SETTLEMENT CLASS, AND  
APPROVAL OF CLASS SETTLEMENT NOTICE**

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AND NOW COME Plaintiffs, Vincent Sorace, Joseph Yerty, Tammy Yerty, James Zaronsky, Linda Zaronsky, Viktor Stevenson, Ashley Yates, and Kimberly Solomon-Robinson, by and through their undersigned counsel, who respectfully request that this Honorable Court enter a Preliminary Approval Order in the form attached hereto: (i) preliminarily approving the Parties'<sup>1</sup> proposed settlement in this action (the "Settlement"), as memorialized in the parties' Class Action Settlement Agreement and Release; (ii) certifying a Settlement Class; (iii) conditionally appointing Plaintiffs as class representatives of the Class; (iv) appointing Richard Shenkan and Shenkan Injury Lawyers, LLC and Hon. Lawrence F. Stengel (Ret.) and Saxton and Stump as Class Counsel; (v) appointing Rust Consulting as the Settlement Administrator; (vi) approving the form and method of the Class Notice attached to the Settlement Agreement to inform the members of the Class of the Settlement and their rights in connection therewith; (vii) setting the date for a hearing as to Final Approval of the Settlement; and, (viii) setting interim deadlines for the members of the Class to object to or request exclusion from the Class. Plaintiffs incorporate Plaintiffs' Memorandum of Law in Support of their Motion for Preliminary Approval, Conditional Certification of Settlement Class, and Approval of Class Notice, which is being contemporaneously filed.

Respectfully submitted,  
SHENKAN INJURY LAWYERS, LLC.  
/s/ Richard Shenkan  
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<sup>1</sup> Capitalized terms refer to defined terms in the Settlement Agreement (Exhibit 1 to the accompanying Brief).

**CERTIFICATE OF SERVICE**

I certify that a copy of this pleading has been sent to all counsel of record, each of whom subscribe to the Court's ECF system, as filed.

SHENKAN INJURY LAWYERS, LLC.

/s/ Richard Shenkan

Richard Shenkan

*Attorney for Plaintiffs*